IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA ANDERSON DIVISION

UNITED STATES OF AMERICA)	CR. NO. <u>8:16cr 48</u>	
)	18 U.S.C. § 371	
vs.)		201
)		.6
HANNAH A. MCADAMS)		
DEWAYNE S. BROOKS)		
GARY M. WHITFIELD)		~ ≥ ≤ ≤
ROGER L. POWELL)	<u>INDICTMENT</u>	3 10
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THE GRAND JURY CHARGES:

1. That beginning at a date unknown to the Grand Jury but from at least in or about July 2015, and continuing thereafter up and to the date of this Indictment, the exact dates being unknown to the Grand Jury, in the District of South Carolina and elsewhere, the defendants, HANNAH A. MCADAMS, DEWAYNE S. BROOKS, GARY M. WHITFIELD, and ROGER L. POWELL, knowingly and willfully did combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to knowingly make, utter, and possess forged securities of organizations that operate in and the activities of which affect interstate commerce, with the intent to deceive another person and organization; and to knowingly and with the intent to defraud, falsely alter, in material respects, money orders provided and issued by and under the direction of the Postal Service and payable in the United States, in violation of Title 18, United States Code, Sections 513(a) and 500.

Manner and Means

2. It was part of the conspiracy that the Defendants stole money orders from

Acceptance Auto Insurance files.

3. It was further part of the conspiracy that Defendants would alter the stolen money orders and then negotiate the money orders for their own use.

4. It was further part of the conspiracy that Defendants would divide among themselves the proceeds from the negotiation of the altered money orders.

Overt Acts

- 5. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of South Carolina:
- a. On or about July 28, 2015, ROGER L. POWELL possessed money order number xxxx-3911, which had been stolen and altered.
- b. On or about July 29, 2015, HANNAH A. MCADAMS possessed money order number xxxx-7627, which had been stolen and altered.
- c. On or about July 29, 2015, DEWAYNE S. BROOKS possessed money order number xxxx-4864, which had been stolen and altered.
- d. On or about July 29, 2015, GARY M. WHITFIELD possessed money order number xxxx-4864, which had been stolen and altered.

All in violation of Title 18, United States Code, Section 371.

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FOREPERSON

WILLIAM N. NETTLES (WJW/jl) UNITED STATES ATTORNEY